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ATTORNEYS FOR DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	Chapter 11 Cases
)	
AMERICAN WORKERS INSURANCE)	Case No. 19-44208-mxm11
SERVICES, INC.,)	
)	
ASSOCIATION HEALTH CARE)	Case No. 19-44209-elm11
MANAGEMENT, INC.)	
)	
Debtors.)	Jointly Administered Under Case No. 19-44208-mxm11

**DEBTORS' AMENDED WITNESS AND EXHIBIT LIST IN CONNECTION WITH
HEARINGS SET FOR DECEMBER 11, 2019**

American Workers Insurance Services, Inc. ("AWIS") and Association Health Case Management, Inc. ("AHCM," and together with AWIS, the "Debtors"), as debtors in possession, file this Amended Witness and Exhibit List in connection with hearing scheduled for **December 11, 2019 at 3:00 p.m.**

WITNESSES

1. Rusty Brock;
2. Delbert Lee;
3. Randee Mascorro;
4. Courtney Robinson;
5. Bill Roberts;
6. Robert Gray or another representative of Insurety Capital LLC;

7. **Randall Johnson;**

8. **David Lindsey;** and

9. Any witness designated or called by any other party.

EXHIBITS

EXHIBIT		OFFERED	ADMITTED	REFUSED
1.	Interim Order Authorizing Use of Cash Collateral, Approving Adequate Protection, Granting Replacement Liens, and Granting Related Relief [Docket No. 45]			
2.	Agreed Amendment to Interim Order Authorizing Use of Cash Collateral, Approving Adequate Protection, and Granting Related Relief [Docket No. 71]			
3.	Supplement to Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Use of Cash Collateral, (B) Approving Adequate Protection, (C) Granting Replacement Liens, (D) Recharacterizing Alleged Assignments as Secured Transactions, and (E) Granting Related Relief [Docket No. 52]			
4.	Notice of Hearing for December 11, 2019 [Docket No. 102]			
5.	Letter from Bobby Forshey to Robert Harrell dated November 27, 2019			
6.	A. October 25, 2019 Wire Transfer to Insurety in the amount of \$115,074.58			
	B. October 28, 2019 Wire Transfer to Insurety in the amount of \$125,566.75			
	C. October 29, 2019 Wire Transfer to Insurety in the amount of \$115,074.58			
	D. November 1, 2019 Wire Transfer to Insurety in the amount of \$273,046.68			
	E. November 7, 2019 Wire Transfer to Insurety in the amount of \$934,107.34			
	F. November 15, 2019 Wire Transfer to Insurety in the amount of \$420,365.26			

EXHIBIT		OFFERED	ADMITTED	REFUSED
	G. November 22, 2019 Wire Transfer to Insurety in the amount of \$417,062.50			
	H. November 27, 2019 Wire Transfer to Insurety in the amount of \$297,198.80			
	I. December 6, 2019 Wire Transfer to Insurety in the amount of \$904,103.69			
7.	A. October 25, 2019 Email with Summary of Collections and Transmitting Collection Report (10/18/19 - 10/20/19)			
	B. October 28, 2019 Email Summary of Collections and Transmitting Collection Report (10/14/19 - 10/20/19)			
	C. November 1, 2019 Email Summary of Collections and Transmitting Collection Report (10/21/19 - 10/27/19)			
	D. November 7, 2019 Email Summary of Collections and Transmitting Collection Report (10/28/19 - 11/03/19)			
	E. November 13, 2019 Email Summary of Collections and Transmitting Collection Report (11/4/19 - 11/10/19)			
	F. November 21, 2019 Email Summary of Collections and Transmitting Collection Report (11/11/19 - 11/17/19)			
	G. November 26, 2019 Email Summary of Collections and Transmitting Collection Report (11/18/19 - 11/24/19)			
	H. December 4, 2019 Email Summary of Collections and Transmitting Collection Report (11/25/19 - 12/1/19)			
	I. Chart of Insurety Payments			
8.	Excerpt of Transcript from October 17, 2019 first-day hearings			

	EXHIBIT	OFFERED	ADMITTED	REFUSED
9.	Order (i) Authorizing the Debtors to Retain CR3 Partners, LLC to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, and (III) Designating William L. Roberts as Chief Restructuring Officer for the Debtors [Docket No. 90]			
10.	Projected New Business Income			
11.	Email from Laurie Rea to Robert Harrell dated December 2, 2019 sending Member Product Cancellation Report			
12.	Commission Assignment Agreement			
13.	Exclusive Management Services Agreement			
14.	TPA Servicing Agreement			
15.	<i>Services Agreement dated January 1, 2019 between Data Partnership Group, LP and Agentra, LLC</i>			
16.	<i>Email correspondence between John Rezac and Bill Roberts dated December 3, 2019 through December 6, 2019</i>			
	Rebuttal exhibits			
	Impeachment exhibits			
	Any exhibit designated or offered by any other party			

Dated: December 8, 2019

Respectfully submitted,

/s/ J. Robert Forshey
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties listed below (with exhibits) via email, and (without exhibits) via ECF electronic Notice on parties who receive notice via the Court's ECF notification system on December 8, 2019.

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/s/ J. Robert Forshey
J. Robert Forshey

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